

# **Exhibit D**

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**From:** Smith, Andrew C. <[andrew.smith@pillsburylaw.com](mailto:andrew.smith@pillsburylaw.com)>  
**Sent:** Friday, August 18, 2023 4:06 PM  
**To:** Jennifer Blecher  
**Cc:** Sant, Geoffrey; Lee, Carol; Ray, III, Hugh M.; Amiad Kushner; Xintong Zhang; Madigan, Sarah M.; Wang, Fangwei  
**Subject:** Re: Huzhou Chuangtai Rongyuan Inv. Mgmt. Partnership, et al. v. Qin, No. 21-cv-9221-KPF – Mr. Qin's Cell Phones

Jennifer,

I note that you did not copy the two Pillsbury attorneys who attended the device collection. I am copying them here. One of them will respond before 4:30 pm.

Sincerely,  
Andy

Sent from my iPhone

**Andrew C. Smith | Partner**  
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On Aug 18, 2023, at 4:00 PM, Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)> wrote:

Counsel,

We have still received no response regarding the status of Mr. Qin's phone, notwithstanding that he fully complied with the Court's order and notwithstanding representations made to the Court that the imaging process would only take a few hours and that the phone would be returned to him today. Mr. Qin needs his phone to, among other things, contact his children, who are currently out of the country. Both phones have been in your vendor's possession for 20 hours and it has been five hours since we inquired about its status. If we do not receive a response indicating the status as well as the time and place of return of the phone by 4:30 p.m., we will be reaching out to the Court for further relief.

- Jennifer

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**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>  
**Date:** Friday, August 18, 2023 at 10:58 AM  
**To:** Sant, Geoffrey <[geoffrey.sant@pillsburylaw.com](mailto:geoffrey.sant@pillsburylaw.com)>, Lee, Carol <[carol.lee@pillsburylaw.com](mailto:carol.lee@pillsburylaw.com)>, Ray, III, Hugh M. <[hugh.ray@pillsburylaw.com](mailto:hugh.ray@pillsburylaw.com)>, Smith, Andrew C. <[andrew.smith@pillsburylaw.com](mailto:andrew.smith@pillsburylaw.com)>  
**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Xintong Zhang <[xzhang@seidenlaw.com](mailto:xzhang@seidenlaw.com)>  
**Subject:** Huzhou Chuangtai Rongyuan Inv. Mgmt. Partnership, et al. v. Qin, No. 21-cv-9221-KPF – Mr. Qin's Cell Phones

Counsel,

I write to confirm that yesterday, Mr. Qin's Chinese cell phone was taken into possession by a third-party vendor during the Court hearing and that his U.S. cell phone was handed over to the vendor without incident last night at the Seiden Law office in your presence, as well as to follow up on the status of both phones. The vendor had stated that it would only take a few hours to image those phones and that they would then be returned to Mr. Qin. Please provide us with the vendor's contact information and let us know when we can expect to receive the phones back.

Separately, our position is that the data from those phones should not be searched until the parties have met and conferred regarding an appropriate protocol that would respect any issues related to attorney-client or other applicable privilege or protection. Please let us know your availability for a call to discuss that issue.

Regards,

Jennifer

**Jennifer Blecher, Esq.**

*Senior Counsel*



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